# DRAFT ENVIRONMENTAL ASSESSMENT AND ANTICIPATED FINDING OF NO SIGNIFICANT IMPACT

# HAMAKUA ROAD MAINTENANCE BASEYARD

Tax Map Key (3) 4-2-5: portion of 1 Hamakua, Island of Hawaii

October, 2007

Prepared For: COUNTY OF HAWAII

**DEPARTMENT OF PUBLIC WORKS** 

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#### 1. INTRODUCTION

# 1.1 Purpose

The County of Hawaii, Department of Public Works (DPW) is proposing to develop a Highway Maintenance Baseyard on approximately 14.9 acres of land in the district of Hamakua, Island of Hawaii. The property involved is situated approximately one mile east of Paauilo Village along the south (mauka) side of the Hawaii Belt Road (Highway 19) at Koholalele, Hamakua, Island of Hawaii, Tax Map Key 4-2-05: portion of 1. (See Figure 1 – Location Map) The proposed use of County land and County funds triggers environmental requirements for the preparation of an Environmental Assessment (EA), in compliance with Chapter 343, Hawaii Revised Statutes.

The project site is part of a 1,040 acre parcel obtained by the County of Hawaii from the Hamakua Sugar Company during bankruptcy proceedings as part of the settlement for unpaid taxes. The property was utilized for the cultivation of sugar but has remained fallow since the close of the sugar company in 1994. The project area has been cleared and a chain link fence has been erected on a portion of the property.

# 1.2 Identification of Proposing Agency

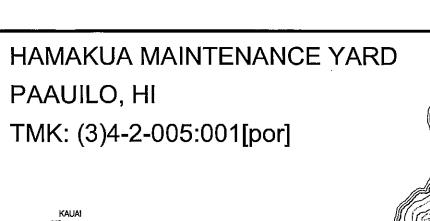
The County of Hawaii, Department of Public Works (DPW) is the proposing agency for the project. Mr. Bruce C. McClure is the Director of the Department of Public Works whose business address is 101 Pauahi Street, Suite 7, Hilo, Hawaii 96720-8360.

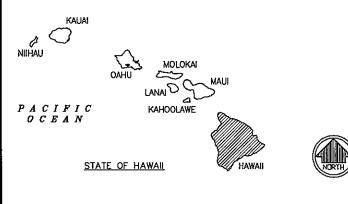
# 1.3 Identification of Approving Agency

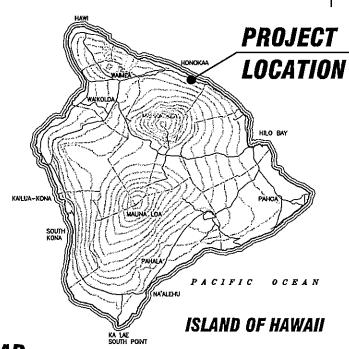
In accordance with Chapter 343, HRS, the Mayor of the County of Hawaii is the appropriate accepting authority of the Environmental Assessment.

# 1.4 Technical Description

The Department of Public Works is proposing to develop a highway maintenance baseyard which will include a maintenance building approximately 40' x 100', a warehouse building approximately 40' x 120', a fueling station, parking spaces for at least 30 vehicles and trucks, a paved access road and fencing. The facility is being designed to accommodate approximately 43 employees, the various vehicles, equipment, materials and supplies utilized by the road maintenance crew. The current equipment and vehicle inventory includes (1) grader, (1) front end loader, (1) back hoe, (5) dump trucks, (3) crew cab dump trucks, (2) flat bed trucks, (1) pick-up truck, (5) grass cutters, (1) roller and (1) front end sweeper. The roadway connection to the State Highway and the interior turning radius within the facility have been designed to accommodate a low boy trailer which will be utilized periodically to transport equipment to and from project sites. The proposed improvements are shown on site plan attached as Figure 2.







**VICINITY MAP NOT TO SCALE** 

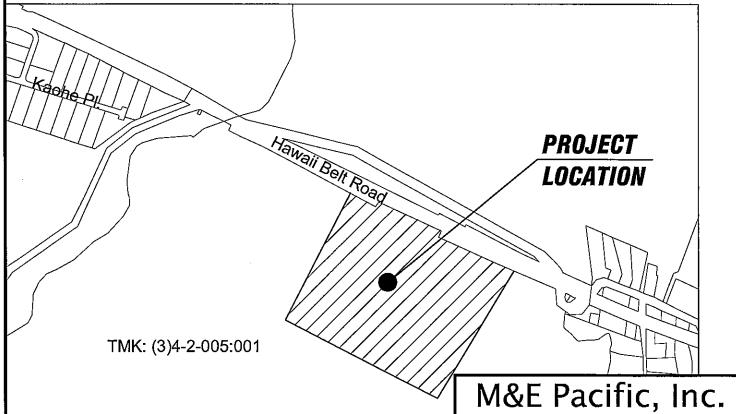


FIGURE 1

**LOCATION MAP NOT TO SCALE** 

METCALF&EDDY | AECOM

DAVIES PACIFIC CTR, STE 1900 · 841 BISHOP ST, HONOLULU, HAWAII 96813

FIGURE 1 **Location Map** 

Hamakua Maintenance Yard

Paauilo, Hawaii October 2007

The estimated construction cost for the proposed project is \$2.4 million. Construction is expected to commence in the first quarter of 2008 and be completed by the end of the year.

# 1.5 Project Background

# 1.5.1 Need for the Project

The proposed project is intended to replace the existing baseyard facility located in Honokaa which is considered to be inadequate because of size and facilities in need of repair. The Honokaa facility is being leased and the existing metal Quonset hut is old, electrical lines do not meet safety standards and the building needs major repairs to its metal structure.

The proposed project site is owned by the County, provides ample space for expansion and is more centrally located within the service area of the facility. The new facilities will also be designed for operation during severe weather conditions to provide supportive services to the community during times of emergency. The proposed improvements will allow the County to provide safer and more efficient highway maintenance services to the community.

# 1.5.2 Land Use Designations

The subject property is situated within the State Land Use Agricultural District. The County General Plan Land Use Pattern Allocation Guide Map (LUPAG) designates this area as "Important Agricultural Land". The county zoning designation for the project area is Agricultural forty acres (A-40a). A Special Permit will be required to allow the non-agricultural use of land within the State Land Use Agricultural District.

The proposed project is not situated within the Special Management Area designated by the County of Hawaii. The project does not involve the placement, erection or removal of materials, nor increase the intensity of use in the Coastal Zone.

# 1.5.3 Listing of Permits and Approvals

The following list of permits and approvals may be required for the proposed project:

County of Hawaii

Hawaii County Planning Commission Department of Public Works Planning Department Special Permit Approval-Project Construction Plans Plan Approval

# 1.6 Agency and Public Consultation

The following public and private agencies and individuals were consulted during the preparation of this environmental assessment:

United States Fish and Wildlife Service, Division of Ecological Services

State of Hawaii, Department of Health

State of Hawaii, Department of Land and Natural Resources, Division of Forestry and Wildlife and the State Historic Preservation Division

State of Hawaii, Department of Transportation

State of Hawaii, Department of Hawaiian Home Lands

State of Hawaii, Office of Hawaiian Affairs

County of Hawaii, Planning Department

County of Hawaii, Department of Public Works

County of Hawaii, Department of Water Supply

County of Hawaii, Police Department

County of Hawaii, Fire Department

County of Hawaii, Department of Environmental Management

Mr. Mason Souza, President, Paauilo Camp Community Association

#### 2. ENVIRONMENTAL SETTING

# 2.1 Physical Environment

# 2.1.1 Geology and Hazards

# Environmental Setting

The project area is located on the lower northeastern slopes of Mauna Kea and consists of the Hamakua volcanic series (Stems and Macdonald, 1946). The Hamakua volcanic series consists mainly of basaltic lava flows.

The volcanic hazard as assessed by the United States Geological Survey for the project area is "8" on a scale of ascending risk 9 to 1 (Heliker 1990). Zone "" includes the lower slopes of Mauna Kea which has not been affected by lava flows for the past 10,000 years.

The island of Hawaii is one of the most seismically active areas in the world and has experienced more than twenty large earthquakes (magnitude 6 or larger) over the past 166 years. (Wyss and Koyanagi, 1992) Magnitude 6 earthquakes can be expected to cause structural damage to non-reinforced buildings. The Building Code rating for the entire island of Hawaii is seismic Zone 4 which has the highest risk for seismic activity.

### **Impacts**

The proposed project will not expose the baseyard facility or the general public to any additional hazard risk that does not already exist. The volcanic hazard risk is relatively low and the same as any other alternative site that could be utilized for the same purpose.

### 2.1.2 Soils

# **Environmental Setting**

The U.S.D.A., Soil Conservation Services Soil Survey of the Island of Hawaii classifies the soil of the subject property as Kukaiau silty clay loam, 6 to 12 percent slopes (KuC). The Kukaiau series consists of well-drained, silty clay loams that formed in volcanic ash. In a representative profile the surface layer is dark grayish brown silty clay loam about 10 inches thick. The subsoil is dark brown silty clay loam about 40 inches thick underlain by basalt. Permeability is moderately rapid, runoff is slow, and the erosion hazard is slight. thin organic soils over pahoehoe lava bedrock. Permeability is rapid, runoff is slow, and the erosion hazard is slight. This soil has a capability subclass rating of Ille which indicates severe limitations that reduce the choice of plants, require very careful management, or both. (U. S. Soil Conservation Service, 1973) The Land Study Bureau's overall master productivity rating for the soils of the project area is Class C which is described as "fair". (Land Study Bureau, 1965)

A portion of the project site is designated as prime agricultural land by the State Department of Agriculture's Agricultural Lands of Importance to the State of Hawaii (ALISH) classification system. These lands have the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops economically when treated and managed according to modern farming methods.

# **Impacts**

Thousands of acres of the former Hamakua Sugar Company lands were designated as prime agricultural land but have not been intensively utilized since the close of the sugar company in 1994. The subject property has not been cultivated or utilized for any agricultural purpose since 1994. The utilization of 14.9 acres of agricultural land for non-agricultural purposes will not have a significant adverse impact on the agricultural activities or potential of the surrounding area.

#### **2.1.3** Climate

# **Environmental Setting**

Hawaii's climate is generally characterized as mild with uniform temperatures, moderate humidity, and two identifiable seasons. The "summer" season, between May and October is generally warmer and drier. The "winter" season, between October and April is cooler and wetter. The project area is situated along the "windward" side of the Island of Hawaii which is exposed to northeasterly trade winds that causes relatively high rainfall (over 100 inches annually). The average monthly minimum temperature along the Hamakua Coast ranges from the mid 60's to 70 degrees Fahrenheit while the average monthly maximum temperature ranges from the mid 70's to the mid 80's. (University of Hawaii Press, 1983)

### **Impacts**

Climatic conditions will not have a significant impact on the proposed project.

# 2.1.4 Hydrology and Drainage

### Environmental Setting

The project area is within the Paauilo aquifer system which has a sustainable yield of approximately 60 million gallons per day. Daily water withdrawals from the Paauilo aquifer system are minimal at this time.

The project area is designated Zone X (Areas determined to be outside the 500-year flood plain) on the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency.

Impacts and Mitigation Measures

Development of the proposed project has the potential to increase surface runoff. The proposed project will adhere to County and State requirements for disposing of runoff and addressing drainage concerns. As such, no adverse drainage impacts are anticipated as a result of the proposed project.

#### 2.1.5 Flora and Fauna

# Environmental Setting

The entire project area has been previously cleared and graded and utilized for sugar cane cultivation. The parcel has remained vacant since the close of the Hamakua Sugar Company in 1994. The vegetation of the project site is a mixture of grasses, predominantly Guinea grass. This vegetation is dominated by introduced or alien species with no candidate, proposed, or listed threatened or endangered species as set forth in the Endangered Species Act of 1973, as amended, are known from this area. Given the extent of prior disturbance by earthmoving equipment, it is highly unlikely that any are present on the subject property.

Although a faunal survey was not conducted, it is highly unlikely that any candidate, proposed, or listed threatened or endangered species would be found on the project site. This is due to the extensive prior disturbance of the project site by earthmoving equipment and the lack of vegetation suitable as a habitat.

# **Impacts**

No listed, candidate or proposed endangered animal or plant species are likely to be found on the proposed project site. The Department of Land and Natural Resouces, Division of Forestry and Wildlife reviewed the proposed project and indicated that, "DLNR, Division of Forestry and Wildlife does not have any management areas near your proposed project and have no objections to the proposed construction of a maintenance base-yard at this location which was previously owned by Hamakua Sugar Company." As such, no significant adverse effects on these species or their habitat is expected as a result of the proposed project.

# 2.1.6 Air Quality

#### Environmental Setting

Pollutants derived from the volcanic emissions from the ongoing Kilauea eruption affect the subject area. Other sources of air pollutants to a limited degree include vehicle emissions and dust from vehicles along the Hawaii Belt Road. In general, however, the ambient air quality of the project area meets all federal and state standards as evidenced by its designation as an "attainment" area by the State Department of Health, Clean Air Branch.

### Impacts and Mitigation Measures

Short term impacts resulting from construction activity include dust and exhaust from machinery involved in the construction of the proposed baseyard facility. The contractor will be required to comply with the appropriate fugitive dust requirements of the State Department of Health.

#### 2.1.7 Noise

# Environmental Setting

Existing noise levels are typical of a rural/agricultural setting which is affected primarily by traffic on the adjacent Hawaii Belt Road. The project site is not situated in close proximity to any significant noise generators such as airports or industrial activity.

# Impacts and Mitigation Measures

Temporary noise impacts will occur from construction activities of the project and are unavoidable. Mitigation measures can be taken, however, to minimize noise impacts including the use of mufflers and implementing construction curfew periods. The contractor will be required to comply with the appropriate noise requirements of the State Department of Health. Upon completion of the parking lot, noise levels should be similar to existing conditions.

# 2.1.8 Scenic and Open Space Resources

# Environmental Setting

The Hamakua district is blessed with open space and scenic vistas in a ruralagricultural setting. The project area, however, does not contain any site example of natural beauty included in the County General Plan.

#### *Impacts*

The proposed project will not have a significant impact on the scenic views or open space resources of the Hamakua district. The Natural Beauty section of the Hawaii County General Plan does not include any natural beauty sites that would be affected by the proposed project.

### 2.2 Social, Cultural and Economic Setting

#### 2.2.1 Socio-Economic Characteristics

#### Setting

Hawaii County's population increased by more than 56,000 persons between 1980 and 2000. Between 1980 and 1990, Hawaii Island's population increased by 31 percent, and increased by 24 percent between 1990 and 2000. The April 1, 2000 population figure for Hawaii County was 148,677 according to census figures compiled by the County of Hawaii, Department of Research and Development.

The Hamakua district has experienced a low population growth rate in comparison to the other districts on the island. Between 1980 and 1990 the district population increased by 8 percent while the County as a whole increased by 31percent. The trend continued between 1990 and 2000 with the district population increasing by 10 percent while the County population increased by 24 percent. The resident population of entire Hamakua district was 6,108 in 2000 which represented approximately 4 percent of the total population for Hawaii Island.

The Hamakua district and the rest of the east Hawaii communities are adjusting to the loss of the sugar industry in the mid 1990's. A total of 700 direct jobs were lost and approximately 20,000 acres of land were removed from production with the closure of the Hamakua Sugar Company in 1994. Although a substantial portion of the former sugar acreage has been planted with eucalyptus trees, the number of jobs generated by the tree farming is substantially less (approximately 100 jobs) than the amount lost with the sugar industry. Agricultural activities that continue in the district include ranching, macadamia nuts, and other diversified agricultural crops. In addition to agriculture, the three major destination resort complexes in the neighboring South Kohala district provides a significant number of jobs which has fueled the continued population growth in the district.

# **Impacts**

The proposed project will not have a substantial impact on the socio-economic character of the region. The proposed improvements will allow the County to operate more efficiently in providing road maintenance services within the district.

# 2.2.2 Adjacent Land Uses

# Existing Setting

The project area is situated in a sparsely populated section at the eastern end of the Hamakua district. The Kaohe Subdivision, a 30-lot residential subdivision, is situated approximately 1,500 feet west of the project area across the Kaholalele Gulch. The Hawaii Belt Road is situated along the north boundary of the project area with eucalyptus plantings across the highway. The remainder of the 1,040 acre project parcel is situated along the southern and eastern boundaries of the project site. Kainehe Village is situated approximately 1,200 feet east of the project area.

# Impacts and Mitigation Measures

The proposed highway maintenance baseyard will be situated more than 1,200 feet from the closest residence and will have little or no impact on the surrounding properties. Temporary noise and dust impacts during the construction of the facility will be minimal and can be mitigated with dust control and noise mitigation measures during construction.

#### 2.3 Public Facilities and Services

#### 2.3.1 Roads and Traffic

#### Setting

The public roadway providing access to the site is the Hawaii Belt Road (Highway 19) which is a two-lane state highway with a pavement width of 24 feet within a 80 feet wide road right-of-way. This highway is the primary roadway link between Hilo and Honokaa and beyond to Waimea. The posted speed limit for the Hawaii Belt Road fronting the project site is 55 miles per hour.

# **Impacts**

In a letter dated September 17, 2007, the director of the State Department of Transportation stated that, "The proposed project is not anticipated to have a significant impact on our State highway facilities. However, the DPW should contact the Highways Division, Hawaii District Office to discuss or coordinate any matters related to traffic at or around the project's driveway to the highway." Discussions have taken place and are ongoing with the State Highways Division, Hawaii District Office to coordinate traffic concerns.

#### 2.3.2 Water

# Existing Setting

The Department of Water Supply has indicated that water can be made available from an existing 2 ¼-inch waterline within Mamalahoa Highway fronting the subject property. The Department of Water Supply noted, however, that water availability in the area only allows for one unit of water, or one 5/8-inch meter, per existing lot of record, which is limited to a maximum of 600 gallons per day.

### Impacts:

The proposed project will include a water catchment system to supplement the limited water available from the Department of Water Supply. As such, the proposed project will not have a significant impact on the existing Department of Water Supply sources or transmission system serving the area.

#### 2.3.3 Wastewater

### Existing Setting

The Hamakua district is not served by a municipal wastewater treatment facility. Sewage effluent generated by the proposed project will be handled with an on-site septic system approved by the State Department of Health.

# **Impacts**

The on-site septic system will be designed and constructed in accordance with the requirements of the State Department of Health.

# 2.3.4 Electricity and Telephone

Existing Setting

Electrical and telephone services are available to the subject property from existing service lines within the State highway right-of-way.

**Impacts** 

The proposed project will not have any impact on the existing capacity of these services.

#### 2.3.5 Solid Waste

Existing Setting

The nearest county solid waste transfer station to the subject property is approximately 1.5 miles west in Paauilo. The nearest landfill is approximately 30 miles southeast of the project area in Hilo.

Impacts and Mitigation Measures

The proposed project will generate green waste and construction waste during construction of the proposed project. The contractor will be required to dispose of the green waste and construction waste in compliance with the requirements of the Department of Environmental Management.

#### 2.3.6 Protective Services

Existing Setting

Protective services including fire, police, rescue and medical services are located in Honokaa approximately 8 miles northwest of the project area.

*Impacts* 

The proposed project will not create an additional burden on the existing protective service providers.

#### 2.3.7 Recreation Facilities

Existing Setting

The proposed project will not have any impacts on recreational facilities located in the district.

#### Impacts

The proposed project will not create an additional burden on existing recreational facilities.

# 2.4 Archaeology, Historic and Cultural Resources

#### Settina

The project area is situated entirely within a parcel that has been extensively cultivated for sugarcane production for many years. Given the extent of land disturbing activities during sugar cultivation, it is highly unlikely that significant historic sites would be found on the subject property. A request for comments was transmitted to the State Historic Preservation Division with a letter dated August 29, 2007. No response from the State Historic Preservation Division has been received to date.

# Impacts and Mitigation Measures

Based on the extensive prior disturbance of the subject property it is highly unlikely that any valued archaeological, floral or faunal resources remain. As such, the proposed project is anticipated to have "no effect" on significant historic sites or cultural activities. In accordance with Section 6E-46.6, Hawaii Revised Statutes and Chapter 13-300, Hawaii Administrative Rules, if any significant cultural deposits or human skeletal remains are encountered during construction, the contractor will be instructed to stop work in the immediate vicinity and the State Historic Preservation Division shall be contacted.

# 3. SUMMARY OF POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS AND PROPOSED MITIGATION MEASURES

# 3.1 Short Term Impacts

Construction Activity:

Impacts: Short term impacts will result from the proposed construction activity including increased noise levels, dust and exhaust from machinery involved in the construction of the baseyard facility. Mitigation measures will be implemented to minimize the potential impacts of these construction activities.

Mitigation: The contractor will be instructed to utilize best management practices to minimize all impacts including the use of mufflers and implementing construction curfew periods. State Department of Health regulations regarding noise and dust will be adhered to during construction.

# 3.2 Long Term Impacts

Drainage and Erosion:

Impacts: Development of the proposed project has the potential to increase surface runoff and flooding in the area.

Mitigation: The proposed project will adhere to County and State requirements for disposing of runoff and addressing drainage concerns. As such, no adverse drainage impacts are anticipated as a result of the proposed project.

Historic Sites:

Impacts: Although unlikely, the proposed project has the potential to destroy historic sites situated within the project area.

Mitigation: The contractor will be instructed to comply with the requirements of Section 6E-46.6, Hawaii Revised Statutes and Chapter 13-300, Hawaii Administrative Rules, if any significant cultural deposits or human skeletal remains are encountered during construction, the contractor will be instructed to stop work in the immediate vicinity and the State Historic Preservation Division shall be contacted.

#### 4. ALTERNATIVES

#### 4.1 No Action

If the proposed baseyard facility is not built on the subject property, the County will evaluate other public purposes for utilizing the County property. There are no other alternative plans that are being considered at this time. In the mean time, the County will continue to utilize the private property in Honokaa which has been determined to be inadequate because of size and facilities in need of repair.

#### 4.2 Alternative Sites

There are no other alternative sites available for the proposed project which is centrally located within the service area, owned by the County of Hawaii and suitable as a baseyard site. Although other sites may exist, they are not located in appropriate locations and will be more costly to develop.

# 5. DETERMINATION, FINDINGS AND REASONS FOR SUPPORTING DETERMINATION

# 5.1 Significance Criteria

According to the Department of Health Rules (1 1-200-1 2), an applicant or agency must determine whether an action may have a significant impact on the environment, including all phases of the project, its expected consequences both primary and secondary, its cumulative impact with other projects, and its short and long-term effects. In making the determination, the Rules establish "Significance Criteria" to be used as a basis for identifying whether significant environmental impact on the environment if it meets any one of the following thirteen criteria.

1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resources.

The proposed project involves the development of a highway maintenance baseyard facility on approximately 14.9 acres of land that has been previously disturbed by heavy equipment during sugarcane cultivation. The project site is currently vacant and does not contain any significant natural or cultural resources.

2. Curtails the range of beneficial uses of the environment.

The project area has been lying vacant for many years. The proposed project will utilize approximately 14.9 acres of a 1,040 parcel and will not foreclose alternative uses of the property for future consideration.

3. Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS; and any revisions thereof and amendments thereto, court decisions, or executive orders.

The proposed development is consistent with the Environmental Policies established in Chapter 344, HRS, and the National Environmental Policy Act.

4. Substantially affects the economic or social welfare of the community or state.

The proposed project will have a beneficial socioeconomic impact by providing a safe and secure highway maintenance baseyard facility that will be able to operate during extreme weather conditions and will provide services to the community during times of emergency.

# 5. Substantially affects public health

The proposed project does not substantially affect public health. Any construction related impacts of noise, dust and emissions will be mitigated by

compliance with the State Department of Health Administrative Rules.

# 6. Involves substantial secondary impacts, such as population changes or effects on public facilities.

The proposed project, in and of itself, will not have any substantial secondary impacts. The proposed improvements are intended to address the existing needs of the highway maintenance crew which is currently utilizing inadequate facilities that are in need of repair.

# 7. Involves a substantial degradation of environmental quality.

The proposed project is situated in a sparsely populated area of the Hamakua district which is primarily rural/agricultural in character. Impacts generated by the proposed project will be minimal and will not involve a substantial degradation of environmental quality.

# 8. Is individually limited but cumulatively has considerable effect on the environment, or involves a commitment for larger actions,

The proposed project will not have any substantial secondary impacts because it is not a generator of growth. The proposed project does not involve a commitment for larger actions and will not induce other actions having a cumulative effect on the environment.

# 9. Substantially affects a rare, threatened or endangered species or its habitat.

The proposed project will not have any substantial adverse effect on any rare, threatened or endangered species or its habitat.

# 10. Detrimentally affects air or water quality or ambient noise levels.

Short term impacts will result from the proposed construction activity including increased noise levels, dust and exhaust from machinery involved in the construction activity. The contractor will be instructed to utilize best management practices to minimize all impacts including the use of mufflers and implementing construction curfew periods. State Department of Health regulations must be adhered to during construction. Given the relative short construction time period, the potential impacts of these construction activities should be minimal.

# 11. Affects or is likely to suffer damage by being located in an environmentally sensitive area, such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, freshwater, or coastal waters.

The project site is not located in an environmentally sensitive area. The flood designation is Zone X (Areas determined to be outside the 500-year flood plain)

and the volcanic hazard risk is relatively low in the entire Hamakua district. All construction activity will be in compliance with current code requirements.

# 12. Substantially affects scenic vistas and view planes identified in county or state plans or studies.

The proposed project will not have a significant impact on the scenic views or open space resources of the Hamakua district. The Natural Beauty section of the Hawaii County General Plan does not include any natural beauty sites that would be affected by the proposed project.

# 13. Requires substantial energy consumption.

The proposed project will not require substantial energy consumption.

# 5.2 Findings

Based on the foregoing information presented, it is determined that the proposed highway maintenance baseyard facility will not have a significant effect. As such, a Finding of No Significant Impact for the proposed project is anticipated.

# 5.3 Reasons Supporting Determination

The nature and scale of the proposed action is such that no significant environmental effects are anticipated. Potential impacts, if any, can be mitigated through careful construction management practices and compliance with all governmental requirements including those of the Department of Public Works and State Department of Health.

#### REFERENCES

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Hawaii Department of Water Supply. December, 1991. Hawaii County Water Use and Development Plan. Hilo, Hawaii.

Heliker, C. 1990. Volcanic and Seismic Hazards on the Island of Hawaii. Washington: GPO.

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U.S. Soil Conservation Service. 1973. Soil Survey of the Island of Hawaii, State of Hawaii. Washington: USDA.

University of Hawaii at Manoa, Dept. of Geography. 1983. Atlas of Hawaii. 2<sup>nd</sup> ed. Honolulu: University of Hawaii Press.

Wyss, M., and Koyanagi, R.Y., 1992, Isoseismal maps, macroseismic epicenters, and estimated magnitudes of historical earthquakes in the Hawaiian Islands: U.S. Geological Survey Bulletin 2006.

# APPENDIX A - REPRODUCTION OF COMMENTS AND RESPONSES MADE DURING THE PRE-ASSESSMENT CONSULTATION PERIOD

- 1. State of Hawaii, Department of Hawaiian Home Lands, from Micah A. Kane, Chairman, dated September 21, 2007.
- 2. State of Hawaii, Office of Hawaiian Affairs, from Clyde W. Nāmu'o, Administrator, dated September 27, 2007.
  - Response: Brian T. Nishimura, Planning Consultant to Clyde W. Nāmu'o, Administrator, dated October 11, 2007.
- 4. State of Hawaii, Department of Land and Natural Resources, Division of Forestry and Wildlife, from Paul J. Conry, Administrator, dated September 4, 2007
- 5. State of Hawaii, Department of Transportation, from Barry Fukunaga, Director, dated September 17, 2007.
  - Response: Brian T. Nishimura, Planning Consultant to Barry Fukunaga, Director, dated October 11, 2007.
- 6. County of Hawaii, Fire Department, from Darryl Oliveira, Fire Chief, dated September 18, 2007.
- 8. County of Hawaii, Police Department, from Samuel Thomas, Major, Area I Operations, dated September 17, 2007.
- 9. County of Hawaii, Planning Department, from Christopher J. Yuen, Director, dated September 11, 2007.
  - Response: Brian T. Nishimura, Planning Consultant to Christopher J. Yuen, Director, dated October 11, 2007.
- 10. County of Hawaii, Department of Water Supply, from Milton D. Pavao, Manager, dated September 24, 2007.
  - Response: Brian T. Nishimura, Planning Consultant to Milton D. Pavao, Manager, dated October 11, 2007.
- 11. County of Hawaii, Department of Environmental Management, from Bobby Jean Leithead-Todd, Director, dated September 10, 2007.

LINDA LINGLE GOVERNOR STATE OF HAWAII



MICAH A. KANE CHAIRMAN HAWAIIAN HOMES COMMISSION

BEN HENDERSON DEPUTY TO THE CHAIRMAN

KAULANA H. PARK EXECUTIVE ASSISTANT

### STATE OF HAWAII

#### DEPARTMENT OF HAWAHAN HOME LANDS

P.O. BOX 1879 HONOLULU, HAWAII 96805

September 21, 2007

Mr. Brian T. Nishimura Planning Consultant 101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Dear Mr. Nishimura:

Thank you for the opportunity to participate in the early consultation phase of an Environmental Assessment report that is being prepared for the County's Department of Public Works for a proposed Hamakua Highway Maintenance Baseyard. The Department of Hawaiian Home Lands has no comments.

Should you have any questions, please call the Planning Office at (808) 586-3836.

Aloha and mahalo,

Micah A. Kane, Chairman Hawaiian Homes Commission

KZ

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#### STATE OF HAWAI'! OFFICE OF HAWAIIAN AFFAIRS

711 KAPI'OLANI BOULEVARD, SUITE 500 HONOLULU, HAWAI'I 96813

September 27, 2007

HRD07\_3193

Brian T. Nishimura, Planning Consultant 101 Aupuni Street, Suite 217 Hilo, Hawai'i 96720-4221

Dear Mr. Nishimura:

Re: Pre- Environmental Assessment Consultation

> County of Hawai'i, Department of Public Works Proposed Hamakua Highway Maintenance Baseyard

Tax Map Key (3) 4-2-05: portion of 1 Koholalele, Hamakua, Hawai'i

The Office of Hawaiian Affairs (OHA) is in receipt of your August 29, 2007 letter seeking comments ahead of an environmental assessment (EA) for a proposed County of Hawai'i, Department of Public Works Maintenance Baseyard. Based on the information included in your letter, the proposed project area was utilized by the Hamakua Sugar Company for the cultivation of sugar and has remained fallow since 1994.

OHA has no comments at this time, but requests assurances that as this project moves forward, should historic properties, cultural deposits or human skeletal remains be inadvertently discovered during ground disturbance, all work will immediately cease, and the appropriate agencies notified pursuant to applicable laws.

Thank you for initiating consultation at this early stage and we look forward to the opportunity to review and provide comment on the forthcoming EA. Should you have any questions, please contact Keola Lindsey, Lead Advocate-Culture at (808) 594-1904.

'O wau iho nō,

Clyde W. Nāmu'o.
Administrator

Administrator

C: Lukela Ruddle, OHA- Community Resource Coordinator, East Hawai'i

#### BRIAN T. NISHIMURA, PLANNING CONSULTANT

101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Phone: (808) 935-7692 Fax: (808) 935-6126 E-mail: btnishi@hawaiiantel.net

October 11, 2007

Mr. Clyde W. Nāmu'o, Administrator State of Hawai'i Office of Hawaiian Affairs 711 Kapi'olani Boulevard, Suite 500 Honolulu, Hawai'i 96813

Subject:

Pre-Assessment Consultation Comments Hamakua Highway Maintenance Baseyard

Applicant: County of Hawaii, Department of Public Works

TMK: (3) 4-2-005: portion of 1

Dear Mr. Nāmu'o:

Thank you for your letter dated September 27, 2007, responding to our request for preassessment comments on the subject matter.

Please be advised that the Draft Environmental Assessment has addressed your concern to protect any inadvertent discovery of archaeological or cultural resources on the subject property. The contractor will be advised that should any remains of historic sites such as rock walls, terraces, platforms marine shell concentrations or human burials be encountered during construction, work in the immediate area will cease and the State Historic Preservation Division will be immediately notified.

Thank you for taking the time to provide your comments. A copy of the Draft Environmental Assessment will be transmitted for your review.

Sincerely,

Brian T. Nishimura, Planning Consultant

#### LINDA LINGLE GOVERNOR OF HAWAII



#### STATE OF HAWAII

#### **DEPARTMENT OF LAND AND NATURAL RESOURCES**

DIVISION OF FORESTRY AND WILDLIFE 1151 PUNCHBOWL STREET HONOLULU, HAWAII 96813

September 4, 2007

Laura H. Thielen, Acting CHAIRPERSON BOARD OF LAND AND NATURAL RESOURCES

DEPUTY DIRECTOR FOR LAND

#### KEN C. KAWAHARA

DEPUTY DIRECTOR FOR THE COMMISSION ON WATER RESOURCE MANAGEMENT

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
COMMISSION ON WATER RESOURCE
MANAGEMENT
GONSERVATION AND COASTAL LANDS
CONSERVATION AND
RESOURCES ENFORCEMENT
CONVEYENCES
FORESTRY AND WILDLIFE
MISTORIC PRESERVATION
KAHOOLAW ISLAND RESERVE
COMMISSION
LAND MANAGEMENT
STATE PARKS

Mr. Brian T. Nishimura Planning Consultant 101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Dear Mr. Nishimura:

Subject: Pre-consultation for proposed Hamakua Highway Maintenance Base-yard, TMK: 4-2-05:1 by County of Hawaii, Department of Public Works

We appreciate the opportunity to comment on your subject request. DLNR, Division of Forestry and Wildlife does not have any management areas near your proposed project and have no objections to the proposed construction of a maintenance base-yard at this location which was previously owned by Hamakua Sugar Company. Thank you for allowing us to review your project.

Sincerely yours,

Administrator

C: DOFAW Hawaii Branch



# STATE OF HAWAII DEPARTMENT OF TRANSPORTATION 869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

September 17, 2007

BARRY FUKUNAGA DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
FRANCIS PAUL KEENO
BRENNON T. MORIOKA
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.2612

Mr. Brian T. Nishimura Planning Consultant 101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Dear Mr. Nishimura:

Subject: Pre-Environmental Assessment Consultation

Department of Public Works (DPW), County of Hawaii Proposed Hamakua Highway Maintenance Baseyard TMK: 4-2-05: portion of 1 Koholalele, Hamakua, Hawaii

Thank you for your transmittal requesting our comments on the subject project to develop a Highway Maintenance Baseyard on approximately 14.9 acres along the south (mauka) side of the Hawaii Belt Road (Highway 19).

The proposed project is not anticipated to have a significant impact on our State highway facilities. However, the DPW should contact the Highways Division, Hawaii District Office to discuss or coordinate any matters related to traffic at or around the project's driveway to the highway.

We appreciate the opportunity to provide comments.

Very tally yours,

BARRY FUKUNAGA Director of T an portation

c: Bruce McClure, Department of Public Works

#### BRIAN T. NISHIMURA, PLANNING CONSULTANT

101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Phone: (808) 935-7692 Fax: (808) 935-6126 E-mail: btnishi@hawaiiantel.net

October 11, 2007

Barry Fukunaga, Director State of Hawaii Department of Transportation 869 Punchbowl Street Honolulu, Hawaii 96813-5097

Subject: Pre-Assessment Consultation Comments

Hamakua Highway Maintenance Baseyard

Applicant: County of Hawaii, Department of Public Works

TMK: (3) 4-2-005: portion of 1

# Dear Mr. Fukunaga:

Thank you for providing your comments regarding the subject matter in your letter dated September 17, 2007. Please be advised that your comments are being addressed and incorporated in the Draft Environmental Assessment.

Please be advised that the design consultants have initiated discussions with the State Department of Transportation, Highways Division, Hawaii District Office regarding traffic issues relating to the project.

Thank you for your assistance in providing your comments. Should you have any questions regarding this transmittal, please do not hesitate to contact me.

Sincerely,

Brian T. Nishimura, Planning Consultant

Harry Kim
Mayor



Darryl J. Oliveira
Fire Chief

Glen P. I. Honda

Deputy Fire Chief

# County of Hawai'i

#### FIRE DEPARTMENT

25 Aupuni Street • Suite 103 • Hilo, Hawai'i 96720 (808) 981-8394 • Fax (808) 981-2037

September 18, 2007

Mr. Brian T. Nishimura, Planning Consultant 101 Aupuni Street Suite 217 Hilo, Hawaii 96720

**SUBJECT:** 

PRE-ENVIRONMENTAL ASSESSMENT CONSULTATION

APPLICANT: COUNTY OF HAWAII, DEPARTMENT OF PUBLIC WORKS PROPOSED HAMAKUA HIGHWAY MAINTENANCE BASEYARD TMK: (3)4-2-05:PORTION OF 1, KOHOLALELE, HAMAKUA, HAWAII

In regards to the above-mentioned pre-environmental assessment consultation, the following shall be in accordance:

Fire apparatus access roads shall be in accordance with UFC Section 10.207:

# "Fire Apparatus Access Roads

- "Sec. 10.207. (a) General. Fire apparatus access roads shall be provided and maintained in accordance with the provisions of this section.
- "(b) Where Required. Fire apparatus access roads shall be required for every building hereafter constructed when any portion of an exterior wall of the first story is located more than 150 feet from fire department vehicle access as measured by an unobstructed route around the exterior of the building.
  - "EXCEPTIONS: 1. When buildings are completely protected with an approved automatic fire sprinkler system, the provisions of this section may be modified.
  - "2. When access roadways cannot be installed due to topography, waterways, nonnegotiable grades or other similar conditions, the chief may require additional fire protection as specified in Section 10.301 (b).



"3. When there are not more than two Group R, Division 3 or Group M Occupancies, the requirements of this section may be modified, provided, in the opinion of the chief, fire-fighting or rescue operations would not be impaired.

"More than one fire apparatus road may be required when it is determined by the chief that access by a single road may be impaired by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.

"For high-piled combustible storage, see Section 81.109.

- "(c) Width. The unobstructed width of a fire apparatus access road shall meet the requirements of the appropriate county jurisdiction.
- "(d) Vertical Clearance. Fire apparatus access roads shall have an unobstructed vertical clearance of not less than 13 feet 6 inches.
  - "EXCEPTION: Upon approval vertical clearance may be reduced, provided such reduction does not impair access by fire apparatus and approved signs are installed and maintained indicating the established vertical clearance.
- "(e) **Permissible Modifications.** Vertical clearances or widths required by this section may be increased when, in the opinion of the chief, vertical clearances or widths are not adequate to provide fire apparatus access.
- "(f) **Surface.** Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be provided with a surface so as to provide all-weather driving capabilities." (20 tons)
- "(g) **Turning Radius.** The turning radius of a fire apparatus access road shall be as approved by the chief." (45 feet)
- "(h) **Turnarounds.** All dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with approved provisions for the turning around of fire apparatus.
- "(i) **Bridges.** When a bridge is required to be used as access under this section, it shall be constructed and maintained in accordance with the applicable sections of the Building Code and using designed live loading sufficient to carry the imposed loads of fire apparatus.
- "(j) **Grade.** The gradient for a fire apparatus access road shall not exceed the maximum approved by the chief." (15%)

- "(k) **Obstruction.** The required width of any fire apparatus access road shall not be obstructed in any manner, including parking of vehicles. Minimum required widths and clearances established under this section shall be maintained at all times.
- "(l) **Signs.** When required by the fire chief, approved signs or other approved notices shall be provided and maintained for fire apparatus access roads to identify such roads and prohibit the obstruction thereof or both."

Water supply shall be in accordance with UFC Section 10.301(c):

"(c) Water Supply. An approved water supply capable of supplying required fire flow for fire protection shall be provided to all premises upon which buildings or portions of buildings are hereafter constructed, in accordance with the respective county water requirements. There shall be provided, when required by the chief, on-site fire hydrants and mains capable of supplying the required fire flow.

"Water supply may consist of reservoirs, pressure tanks, elevated tanks, water mains or other fixed systems capable of providing the required fire flow.

"The location, number and type of fire hydrants connected to a water supply capable of delivering the required fire flow shall be protected as set forth by the respective county water requirements. All hydrants shall be accessible to the fire department apparatus by roadways meeting the requirements of Section 10.207.

Fire Chief

PBE:lpc



# DEPARTMENT OF WATER SUPPLY . COUNTY OF HAWAI'I

345 KEKŪANAŌʻA STREET, SUITE 20 • HILO, HAWAIʻI 96720 TELEPHONE (808) 961-8050 • FAX (808) 961-8657

September 24, 2007

Mr. Brian T. Nishimura, Planning Consultant 101 Aupuni Street, Suite 217 Hilo, HI 96720-4221

# PRE-ENVIRONMENTAL ASSESSMENT CONSULTATION PROPOSED HAMAKUA HIGHWAY MAINTENANCE BASEYARD TAX MAP KEY 4-2-005:001 (PORTION)

This is in response to your Pre-Environmental Assessment consultation letter, dated August 29, 2007.

Water can be made available from an existing 2 1/4-inch waterline within Mamalahoa Highway, fronting the subject parcel. Water availability in the area, which is subject to change without notice, only allows for one unit of water, or one 5/8-inch meter, per existing lot of record, which is limited to a maximum of 600 gallons per day.

Subject to the above, the Department has no objection to the proposed project, subject to the following conditions:

- 1. Submit estimated maximum daily water usage calculations provided by a professional engineer licensed in the State of Hawai'i. The calculations should include the estimated peak flow in gallons per minute and the total estimated maximum daily water usage in gallons per day. Please keep in mind that the Department can only provide a maximum of 600 gallons per day.
- 2. Based on the calculations provided in Item 1, the Department will determine whether water is available and the necessary facilities charge and installation fee required.
- 3. A reduced pressure type backflow prevention assembly must be installed within five (5) feet of the meter on private property. The installation of the backflow prevention assembly must be inspected and approved by the Department prior to commencement of water service.
- 4. Subject to other agencies' requirements to construct improvements within the road right-of-way fronting the property affected by the proposed project, the applicant shall be responsible for the relocation and adjustment of the Department's affected water system facilities, should they be necessary.
- 5. Please be informed that the existing 2 1/4-inch waterline is inadequate to provide 2,000 gallons per minute fire flow, as required per the Department's Water System Standards for the proposed land

... Water brings progress...

Mr. Brian T. Nishimura Page 2 September 24, 2007

use. The applicant should contact the Fire Department for any fire protection requirements or alternatives.

Should there be any questions, you may contact Mr. Finn McCall of our Water Resources and Planning Branch at 961-8070, extension 255.

Sincerely yours,

L Milton D. Pavao, P.E.

Manager

FM:dfg

#### BRIAN T. NISHIMURA, PLANNING CONSULTANT

101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Phone: (808) 935-7692 Fax: (808) 935-6126 E-mail: btnishi@hawaiiantel.net

September 11, 2007

Mr. Milton D. Pavao, Manager County of Hawaii Department of Water Supply 345 Kekuanaoa Street, Suite 20 Hilo, Hawaii 96720

Subject:

Pre-Assessment Consultation Comments Hamakua Highway Maintenance Baseyard

Applicant: County of Hawaii, Department of Public Works

TMK: (3) 4-2-005: portion of 1

Dear Mr. Pavao:

Thank you for providing your comments regarding the subject matter in your letter dated September 24, 2007. Please be advised that your comments and concerns have been noted and will be addressed. The design consultants have included a water catchment system to supplement the water available to the subject property from your existing 2 ½ - inch waterline.

Thank you again for your comments during the pre-assessment consultation process.

Sincerely,

Brian T. Nishimura, Planning Consultant



Lawrence K. Mahuna
Police Chief

Harry S. Kubojiri
Deputy Police Chief

**POLICE DEPARTMENT**349 Kapiolani Street • Hilo, Hawaii 96720-3998
(808) 935-3311 • Fax (808) 961-8869

September 17, 2007

Mr. Brian T. Nishimura Planning Consultant 101 Aupuni Street, Suite 217 Hilo, Hawaii 96720

Dear Mr. Nishimura:

**SUBJECT:** Pre-Environmental Assessment Consultation

Applicant: County of Hawaii, Department of Public Works

**Proposed Hamakua Maintenance Baseyard** 

TMK: (3) 4-2-05: Portion of 1 Koholalele, Hamakua, Hawaii

Staff, upon reviewing the provided documents and visiting the proposed site, does not anticipate any adverse public safety concerns.

Thank you for the opportunity to comment.

Sincerely,

SAMUEL THOMAS

MAJOR

**AREA I OPERATIONS** 

EWR:lli

Harry Kim Mayor



Christopher J. Yuen

Director

Brad Kurokawa, ASLA LEED® AP

Deputy Director

# County of Hawaii PLANNING DEPARTMENT

101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-4224 (808) 961-8288 • FAX (808) 961-8742

September 11, 2007

Mr. Brian T. Nishimura Planning Consultant 101 Aupuni Street, Suite 217 Hilo, HI 96720-4221

Dear Mr. Nishimura:

Subject: Pre-Assessment Consultation for Draft Environmental Assessment (EA)

Project: Hamakua Highway Maintenance Baseyard

Tax Map Key: (3) 4-2-005: portion of 001; Koholalele, Hamakua, Hawaii

This is in response to your letter dated August 29, 2007, in which you requested our comments on any special environmental conditions or impacts related to the proposed development.

The subject 14.9-acre proposed project site is a portion of a 1040-acre parcel and is located in the State Land Use Agricultural district. The County zoning designation for the property is Agricultural (A40a). The property is designated as "Important Agricultural Lands" in the Land Use Pattern Allocation Guide Map of the General Plan. In addition, the property is within an area classified as Agricultural Lands of Importance to the State of Hawaii (ALISH) as prime and other agricultural land. Soils on the property near the proposed project site are classified with a productivity rating class C by the Land Study Bureau. Therefore, the Draft EA should discuss the suitability of the proposed project on the subject property given its designation as Important Agricultural Lands.

This parcel is not located in the County's Special Management Area. Therefore, Special Management Area rules and regulations are not applicable.

The Draft EA should include a discussion on traffic impacts in general; but specifically related to whether traffic warrants are met to require adequate acceleration, deceleration, and left-turn storage into and out of the project roadway at the highway for the highway maintenance vehicles, which require greater acceleration and deceleration distances than a passenger vehicle.

Mr. Brian T. Nishimura Planning Consultant September 11, 2007 Page 2

Your letter mentions that the project area has been cleared. The intent of the environmental review process is to disclose and mitigate potential impacts to various resources, such as cultural, historical, and biological/ecological resources. By clearing the project area prior to completing environmental review these resources, if they had been present at the project site, would already be impacted. In the future, we suggest waiting until after the environmental review process has been completed to commence earthworks related to site preparation.

A Special Permit is required for the proposed project pursuant to Planning Commission Rule 6, Section 6-2, which states "any person who desires to use its land within a State Land Use agricultural or rural district other than for an agricultural or rural use may petition the Commission for permission to use its land in the manner desired." The special permit process will require at least one public hearing, and can take up to 120 days to complete.

Please provide this office with a copy of the draft EA upon its publication. Should you have questions, please contact Maija Cottle of my staff at 961-8288 extension 253.

Sincerely,

CHRISTOPHER J. VUEN

Planning Director

MJC:cd

P:\wpwin60\Maija\EA-EIS\Nishimura Hamakua Hwy Baseyard 4-2-5-1 Pre-cmnts.doc

#### BRIAN T. NISHIMURA, PLANNING CONSULTANT

101 Aupuni Street, Suite 217 Hilo, Hawaii 96720-4221

Phone: (808) 935-7692 Fax: (808) 935-6126 E-mail: btnishi@hawaiiantel.net

October 11, 2007

Mr. Christopher J. Yuen, Director County of Hawaii Planning Department 101 Pauahi Street, Suite 3 Hilo, Hawaii 96720-3043

Subject:

Pre-Assessment Consultation Comments Hamakua Highway Maintenance Baseyard

Applicant: County of Hawaii, Department of Public Works

TMK: (3) 4-2-005: portion of 1

Dear Mr. Yuen:

Thank you for providing your comments regarding the subject matter in your letter dated September 11, 2007. Please be advised that your comments are being addressed and incorporated in the Draft Environmental Assessment.

With regard to traffic impacts, the State Department of Transportation has commented that "The proposed project is not anticipated to have a significant impact on our State highway facilities. However, the DPW should contact the Highways Division, Hawaii District Office to discuss or coordinate any matters related to traffic at or around the project's driveway to the highway. Please be advised that the design consultants have initiated discussions with the State Department of Transportation, Highways Division, Hawaii District Office regarding traffic issues relating to the project.

Your concern regarding the clearing of the project area is noted and has been relayed to the Department of Public Works.

The Department of Public Works will be submitting a Special Permit Application to the Planning Department to allow the proposed baseyard facility.

Thank you again for your pre-assessment comments on the subject project. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Brian T. Nishimura, Planning Consultant



Bobby Jean Leithead-Todd Director

Nelson Ho
Deputy Director

# County of Hawaii

# DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

25 Aupuni Street • Hilo, Hawai`i 96720-4252 (808) 961-8083 • Fax (808) 961-8086 http://co.hawaii.hi.us/directory/dir envmng.htm

September 10, 2007

Mr. Brian T. Nishimura Planning Consultant 101 Aupuni Street, Suite 217 Hilo, HI 96720-4221

SUBJECT: Pre-Environmental Assessment Consultation

Applicant: County of Hawai'i Department of Public Works

Proposed Hamakua Highway Maintenance Baseyard

TMK: 4-2-05: portion of 1 Koholalele, Hamakua, Hawai'i

Dear Mr. Nishimura,

We have no comments to offer on the subject EA.

Thank you for allowing us the opportunity to review and comment on this project.

Sincerely,

Bobby Jean Leithead-Todd

**DIRECTOR**